

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 04-269</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: May 19, 2004</b>
<b>GERALD THOMAS,</b>	<b>:</b>	<b>VIOLATIONS:</b>
a/k/a "Baha Jabbaar,"	<b>:</b>	<b>21 U.S.C. § 846</b>
a/k/a "Bubbie,"	<b>:</b>	<b>(conspiracy to manufacture and</b>
<b>KABONI SAVAGE,</b>	<b>:</b>	<b>distribute cocaine and crack – 1 count)</b>
a/k/a "Yusef Billa,"	<b>:</b>	<b>18 U.S.C. § 1956(h) (conspiracy to</b>
a/k/a "Joseph Amill,"	<b>:</b>	<b>launder monetary instruments – 1 count)</b>
a/k/a "Bonnie," "Bon"	<b>:</b>	<b>18 U.S.C. § 1956(a)(1) (money laundering</b>
a/k/a "B,"	<b>:</b>	<b>– 8 counts)</b>
<b>PAUL DANIELS,</b>	<b>:</b>	<b>18 U.S.C. § 992(g)(1) (convicted felon in</b>
a/k/a "Paul Robinson,"	<b>:</b>	<b>possession of a firearm – 2 counts)</b>
a/k/a "P,"	<b>:</b>	<b>18 U.S.C. § 924(c) (possession of a</b>
<b>ROBERT WILKS,</b>	<b>:</b>	<b>firearm in furtherance of a drug</b>
a/k/a "Miami,"	<b>:</b>	<b>trafficking offense – 1 count)</b>
a/k/a "Robert Williams,"	<b>:</b>	
<b>DAWUD BEY</b>	<b>:</b>	<b>Notice of forfeiture</b>
<b>STEVEN NORTHINGTON,</b>	<b>:</b>	
a/k/a "Smoke,"	<b>:</b>	
a/k/a "Michael Tillery,"	<b>:</b>	
a/k/a "Syeed Burhannon,"	<b>:</b>	
a/k/a "Kevin Lewis,"	<b>:</b>	
<b>OSCAR FRANCIS</b>	<b>:</b>	
<b>MYRON WILSON</b>	<b>:</b>	
<b>MELVIN STEIN</b>	<b>:</b>	
<b>JOSEPH NEWMAN,</b>	<b>:</b>	
a/k/a "Gerald King,"	<b>:</b>	
a/k/a "Yusef,"	<b>:</b>	
<b>DAMMON EVERETT,</b>	<b>:</b>	
a/k/a "Bud,"	<b>:</b>	
<b>JAMES WALKER,</b>	<b>:</b>	
a/k/a "Candy,"	<b>:</b>	
<b>GREGORY MILLS,</b>	<b>:</b>	
a/k/a "Philly Frank,"	<b>:</b>	
<b>DAREN BLACKWELL,</b>	<b>:</b>	
a/k/a "Double,"	<b>:</b>	
<b>TYRONE BEAL,</b>	<b>:</b>	
a/k/a "Scoop,"	<b>:</b>	
<b>DEREK RUSSELL,</b>	<b>:</b>	
a/k/a "Fly,"	<b>:</b>	
<b>DEMETRIUS WILLIAMS,</b>	<b>:</b>	
a/k/a "Meat,"	<b>:</b>	
<b>MALIK JONES</b>	<b>:</b>	
<b>RONALD JONES,</b>	<b>:</b>	
a/k/a "Sneaker Store,"	<b>:</b>	
<b>RICHARD BOND</b>	<b>:</b>	

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**(Conspiracy to Manufacture and Distribute Cocaine and Cocaine Base)**

**THE GRAND JURY CHARGES THAT:**

1. From in or about September 1999 through in or about April 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**GERALD THOMAS,  
a/k/a "Baha Jabbaar,"  
a/k/a "Bubbie,"  
KABONI SAVAGE,  
a/k/a "Yusef Billa,"  
a/k/a "Joseph Amill,"  
a/k/a "Bonnie," "Bon," "B,"  
PAUL DANIELS,  
a/k/a "Paul Robinson,"  
a/k/a "P,"  
ROBERT WILKS,  
a/k/a "Miami,"  
a/k/a "Robert Williams,"  
DAWUD BEY,  
STEVEN NORTHINGTON,  
a/k/a "Smoke,"  
a/k/a "Michael Tillery,"  
a/k/a "Syeed Burhannon,"  
a/k/a "Kevin Lewis,"  
OSCAR FRANCIS,  
MYRON WILSON,  
JOSEPH NEWMAN,  
a/k/a "Gerald King,"  
a/k/a "Yusef,"  
DAMMON EVERETT,  
a/k/a "Bud,"  
JAMES WALKER,  
a/k/a "Candy,"  
GREGORY MILLS,  
a/k/a "Philly Frank,"  
DAREN BLACKWELL,  
a/k/a "Double,"  
TYRONE BEAL,  
a/k/a "Scoop,"  
DEREK RUSSELL,  
a/k/a "Fly,"  
DEMETRIUS WILLIAMS,  
a/k/a "Meat,"  
MALIK JONES,  
RONALD JONES,  
a/k/a "Sneaker Store," and  
RICHARD BOND,**

knowingly conspired and agreed together and with others known and unknown to the grand jury, including Eugene Coleman, a/k/a "Twin," Wendell Mason, Juan Rosado, a/k/a "Chuck," David Vaquez, Craig Oliver, and Joslyn Morgan, Jr., each of whom is charged elsewhere, and Kareem Bluntly, now deceased, to manufacture and distribute more than five kilograms of a mixture and substance containing cocaine, a Schedule II controlled substance, and more than 50 grams of a mixture and substance containing cocaine base, commonly known as "crack," a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

2. **GERALD THOMAS** and **KABONI SAVAGE** supervised, managed, organized and led a drug trafficking enterprise (the "Thomas-Savage Organization"), which processed and distributed kilogram quantities of cocaine in and around Philadelphia, Pennsylvania. Their activities included, but were not limited to, obtaining multi-kilogram quantities of cocaine and supplying the cocaine to other defendants and co-conspirators for distribution, maintaining an available supply of cocaine for the distributors, giving directions to members of the conspiracy, collecting proceeds from the distribution of cocaine, and mediating disputes among members of the organization.

3. The Thomas-Savage Organization obtained, received, possessed, processed, stored, and distributed hundreds of kilograms of cocaine, which the defendants and co-conspirators obtained from multiple suppliers in Pennsylvania, New York, Florida, and elsewhere.

(a) **GERALD THOMAS** obtained multiple kilogram quantities of cocaine from a supplier, known to the grand jury, based in Norristown, Pennsylvania.

(b) **KABONI SAVAGE** and others known and unknown to the grand jury obtained multiple kilogram quantities of cocaine from a supplier, known to the grand jury, based in Florida.

(c) Craig Oliver conducted kilogram quantity cocaine transactions, both as a supplier and distributor, with **KABONI SAVAGE** and **GERALD THOMAS**. The activities of Craig Oliver included but were not limited to obtaining multi-kilogram quantities of cocaine and supplying them to other defendants and co-conspirators for distribution. His activities also included distributing cocaine and collecting proceeds from the distribution of cocaine.

(d) Juan Rosado, aided by David Vacquez, supplied **KABONI SAVAGE** with approximately 160 kilograms of cocaine. **SAVAGE** in turn supplied kilograms of cocaine obtained from Rosado and Vacquez to **GERALD THOMAS** and other co-conspirators known and unknown to the grand jury.

(e) **GERALD THOMAS** and **KABONI SAVAGE** obtained multiple kilogram quantities of cocaine from other suppliers, known and unknown to the grand jury, based in the Philadelphia area.

4. In an attempt to enhance its drug profits, the Thomas-Savage Organization broke down kilograms of cocaine, mixed the cocaine with procaine and other cutting agents and ingredients, then re-compressed the cocaine into kilogram brick form to give it the appearance of unadulterated cocaine. This process is known as “re-rocking” or “re-compressing” the cocaine.

(a) **GERALD THOMAS** procured the assistance of others known and unknown to the grand jury to obtain metal plates, presses, molds, and other equipment to be used by the Thomas-Savage Organization in breaking down, cutting, and re-compressing kilograms of cocaine. **THOMAS** instructed these other individuals as to the specifications needed for the metal presses, plates, molds, and other items of equipment, and these other individuals then

obtained the metal presses, plates, molds, and other items from various welders to fit the dimensions requested by **THOMAS**.

(b) **KABONI SAVAGE** possessed and used equipment for the re-compression of cocaine, obtaining re-compression devices from **GERALD THOMAS** and other suppliers of such equipment.

(c) **OSCAR FRANCIS**, Eugene Coleman, and Kareem Bluntly worked for and with **KABONI SAVAGE**. Their activities included, but were not limited to, operating the re-rocking or re-compression devices in an effort to break down, cut, and re-compress kilograms of cocaine obtained by **SAVAGE**. **FRANCIS**, Coleman, and Bluntly also assisted in the distribution of cocaine, and in collecting proceeds from the distribution of cocaine.

(d) **DAREN BLACKWELL** and **TYRONE BEAL** worked for and with **GERALD THOMAS**, **PAUL DANIELS**, and **ROBERT WILKS**. Their activities included, but were not limited to, operating the re-rocking or re-compression devices in an effort to break down, cut, and re-compress the kilograms of cocaine obtained by **THOMAS**, **DANIELS**, and **WILKS**. **BLACKWELL** and **BEAL** also assisted **KABONI SAVAGE** in re-compressing kilograms of cocaine, and in distributing cocaine.

5. In an effort to expand its customers and to increase its profits, the Thomas-Savage Organization, including **GERALD THOMAS**, **KABONI SAVAGE**, **ROBERT WILKS**, **STEVEN NORTHINGTON**, **GREGORY MILLS**, **MALIK JONES**, **RONALD JONES**, **RICHARD BOND**, and others known and unknown to the grand jury, also processed powder cocaine into cocaine base, also known as "crack" and "rock," for distribution to others.

6. Members of the Thomas-Savage Organization distributed cocaine and crack to other distributors.

(a) **PAUL DANIELS**, **ROBERT WILKS**, **DAWUD BEY**, **STEVEN NORTHINGTON**, **MYRON WILSON**, Joslyn Morgan, Jr., and others known and unknown to the grand jury, were supplied cocaine by **KABONI SAVAGE** for distribution to others.

(b) **JAMES WALKER, DAMMON EVERETT, DEREK RUSSELL, DEMETRIUS WILLIAMS, GREGORY MILLS, JOSEPH NEWMAN, RONALD JONES, MALIK JONES, and RICHARD BOND**, and others known and unknown to the grand jury, were supplied cocaine by **GERALD THOMAS** for distribution to others.

7. The defendants and their co-conspirators used telephones, cellular telephones, and pagers to communicate among themselves and with others to further the objectives of the conspiracy. In particular, members of the conspiracy used these devices to arrange and discuss the purchase and distribution of cocaine, to discuss and determine quantities and prices of cocaine available for distribution, to discuss amounts owed for cocaine, and to arrange for the collection and delivery of cash representing the proceeds from and payments for the distribution of cocaine.

(a) The defendants and their co-conspirators, in an effort to conceal their unlawful activities from law enforcement, used coded and cryptic language when discussing and negotiating cocaine transactions and deliveries, the prices associated with various quantities of cocaine, and the exchange and delivery of money. Code words used to refer to cocaine included, but were not limited to: “chumps,” “brick,” “work,” “jawns,” “basketballs,” “birds,” “hard,” “soft,” “crack,” “powder,” “deuce,” “trey,” “dime,” “pound,” “nine,” and “four-and-a-half.” Code words used to refer to money or cash drug proceeds included, but were not limited to: “nickel,” “dime,” and “stack.”

8. **GERALD THOMAS, PAUL DANIELS, DAREN BLACKWELL, TYRONE BEAL, KABONI SAVAGE, OSCAR FRANCIS**, Eugene Coleman, and Kareem Bluntly, and others known and unknown to the grand jury, operated and maintained "press houses" or “stash houses” that were used to store cocaine, re-compression devices, drug packaging materials, and other drug-related items. At these locations, the Thomas-Savage Organization operated re-compression devices, breaking down, cutting, and re-compressing kilograms of cocaine obtained by the organization. Cocaine and large amounts of money were

dropped off and picked up at these locations. The locations of these press houses included, but were not limited to: 9451 Clark Street, Apt. 6, Philadelphia, Pennsylvania; The Village of Stony Run, Apartment 46C, Maple Shade, New Jersey; 3643 North Darien Street, Philadelphia, Pennsylvania; 1805 East Tulpehocken Street, Philadelphia, Pennsylvania; 396 East Upsal Street, Apt. C, Philadelphia, Pennsylvania; 1546 East Upsal Street, Philadelphia, Pennsylvania; 9 Blue Grass Road, Clementon, New Jersey; and 3510 Palmetto Street, Philadelphia, Pennsylvania. Other persons connected to the Thomas-Savage Organization operated re-compression devices at other locations, including but not limited to 450 Vernon Road, Philadelphia, Pennsylvania.

9. The defendants and their co-conspirators obtained, directly and indirectly, cash proceeds in exchange for the distribution of powder cocaine and crack cocaine.

(a) The defendants and their co-conspirators engaged in an arrangement known as “fronting,” in which the supplier provided cocaine to a co-conspirator without being paid, but with the agreement and expectation that full payment would be made after the cocaine had been distributed by the co-conspirator.

(b) The defendants and their co-conspirators received, collected, possessed, transported and delivered large amounts of cash, which constituted proceeds from the distribution of cocaine and money used to pay for cocaine.

(c) The defendants and their co-conspirators regularly met at 3643 North Darien Street, Philadelphia, Pennsylvania, the residence of **KABONI SAVAGE**, where they possessed and distributed cocaine, and exchanged and collected large amounts of cash, which constituted the proceeds from the distribution of cocaine.

(d) The defendants and their co-conspirators provided monetary gifts and financial support to co-conspirators and their families when members of the Thomas-Savage Organization were incarcerated to respect and promote loyalty among the co-conspirators.

(e) **MELVIN STEIN**, who is not charged in this Count but is charged in Count Two of this Indictment, assisted the Thomas-Savage Organization in laundering drug proceeds obtained from the distribution of cocaine, by knowingly accepting drug proceeds as payment for the purchase and rental of real property, and the purchase of automobiles, and by assisting members of the Thomas-Savage Organization to conceal the nature, source, ownership, and control of the drug proceeds, by placing the title to properties and vehicles in false names or the names of third parties, and by creating or submitting false documents or not documenting the transaction. Properties and automobiles obtained in this manner were used by the defendants and their co-conspirators in furtherance of the drug trafficking activities of the Thomas-Savage Organization.

10. **KABONI SAVAGE, GERALD THOMAS, and STEVEN NORTHINGTON**, and others known and unknown to the grand jury, obtained, stored, carried, and possessed firearms to protect themselves and their drug inventories, profits, proceeds and other drug-related activities in furtherance of the Thomas-Savage Organization.

11. **KABONI SAVAGE** and others known and unknown to the grand jury committed, attempted to commit, and threatened to commit acts of violence to protect drug profits, to collect drug debts, and to further the objectives of the conspiracy.

12. **GERALD THOMAS, KABONI SAVAGE, PAUL DANIELS, ROBERT WILKS, STEVEN NORTHINGTON**, Craig Oliver, and others known and unknown to the grand jury, in an effort to evade detection from law enforcement, to conceal their illegal activities, and to disguise the nature, source, and location of their drug proceeds, used false names, surrogates, or straw purchasers to obtain motor vehicles, cell phones, apartments, real estate, and other property. For example, **KABONI SAVAGE** used the false names “Joseph Amill” and “Yusef Billa”; **GERALD THOMAS** used the false name “Baha Jabbaar”; **PAUL DANIELS** used the false name “Paul Robinson”; **ROBERT WILKS** used the false name “Robert Williams”; **STEVEN NORTHINGTON** used the false names “Michael Tillery” and



“Syeed Burhannon,” among others; and Craig Oliver used the false names “James Blair” and “Craig Walters.”

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its object, the following overt acts, among others, were performed in the Eastern District of Pennsylvania and elsewhere:

1. On or about September 8, 1999, **KABONI SAVAGE** and an individual known to the grand jury obtained at least ten kilograms of cocaine from a supplier based in Florida.
2. On or about September 8, 1999, **KABONI SAVAGE**, Eugene Coleman, and other persons known to the grand jury, manufactured and re-compressed at least ten kilograms of cocaine at Village of Stony Run, Apartment 46C, Maple Shade, New Jersey, an apartment leased to **KABONI SAVAGE** under the false name “Joseph Amill.”
3. On or about September 8, 1999, **KABONI SAVAGE** distributed a multi-kilogram quantity of cocaine to **GERALD THOMAS** for distribution to others.
4. On or about September 8, 1999, **KABONI SAVAGE** distributed kilogram quantities of cocaine to **MYRON WILSON** and others known to the grand jury.
5. On or about September 10, 1999, **KABONI SAVAGE** and other persons known and unknown to the grand jury occupied Apartment 46C, located at Village of Stony Run, Maple Shade, New Jersey, where cocaine, “re-rocking” presses, packaging materials, and substances used as “cutting” agents were stored.
6. On or about September 17, 1999, **KABONI SAVAGE** possessed items used in the re-compression of cocaine at a self-storage locker at Devon Self-Storage, 12005 Roosevelt Boulevard, Philadelphia, Pennsylvania, which **SAVAGE** leased under the false name “Joseph Amill.”
7. In or about May 2000, **GERALD THOMAS, DAWUD BEY, MYRON WILSON**, and others known and unknown to the grand jury, offered monetary gifts and

financial support to **KABONI SAVAGE** as a show of respect and loyalty upon his release from custody in an unrelated matter.

8. In or about May 2000, Craig Oliver distributed approximately three kilograms of cocaine to **KABONI SAVAGE** at 3643 North Darien Street, Philadelphia, Pennsylvania.

9. In or about May 2000, **GERALD THOMAS** delivered steel presses and molds, which he intended to be used for the manufacture and re-compression of kilograms of cocaine, to **KABONI SAVAGE** and other defendants and co-conspirators at 3643 North Darien Street.

10. In or about May 2000, **KABONI SAVAGE**, Kareem Bluntly, and Eugene Coleman manufactured and re-compressed approximately three kilograms of cocaine at 3643 North Darien Street.

11. In or about the summer of 2000, **KABONI SAVAGE** met Juan Rosado at Morgan's Auto Tags, Ninth and Cayuga Streets, Philadelphia, Pennsylvania, to negotiate the sale and purchase of one kilogram of cocaine.

12. In or about the summer of 2000, **KABONI SAVAGE** advised Juan Rosado that he could "move," that is, distribute as much cocaine as Rosado could supply, and he requested that Rosado regularly supply **SAVAGE** with multiple kilograms of cocaine.

13. From in or about the summer of 2000 through on or about January 18, 2001, Juan Rosado distributed multiple-kilogram quantities of cocaine one to two times per week to **KABONI SAVAGE**.

14. From in or about the summer of 2000 through on or about January 18, 2001, Eugene Coleman, Kareem Bluntly, **DAREN BLACKWELL**, **TYRONE BEAL**, **OSCAR FRANCIS**, and others known and unknown to the grand jury, regularly manufactured and re-compressed multiple kilograms of cocaine at the direction of **KABONI SAVAGE** and **GERALD THOMAS**.

15. On or about September 27, 2000, **KABONI SAVAGE, GERALD THOMAS**, and **PAUL DANIELS** had telephone conversations, in which they negotiated and arranged in coded and cryptic language for **SAVAGE** to provide **DANIELS** and **THOMAS** with at least two kilograms of cocaine.

16. On or about September 27, 2000, **GERALD THOMAS** had a telephone conversation with K.C., a person known to the grand jury, in which **THOMAS** requested in coded and cryptic language that K.C. supply and deliver equipment needed in the re-compression of cocaine.

17. On or about September 27, 2000, **GERALD THOMAS** and **DAMMON EVERETT** had telephone conversations in which they arranged in coded and cryptic language for **THOMAS** to provide **EVERETT** with one kilogram of cocaine.

18. On or about September 27 and 28, 2000, **GERALD THOMAS** had telephone conversations with **TYRONE BEAL** and **PAUL DANIELS**, in which they discussed in coded and cryptic language the re-compression of the kilograms of cocaine by **BEAL** and **DAREN BLACKWELL** at **DANIELS**'s house, located at 1805 East Tulpehocken Street.

19. On or about September 28, 2000, **GERALD THOMAS** had telephone conversations with **RICHARD BOND**, in which they arranged in coded and cryptic language for **THOMAS** to provide **BOND** with cocaine, and in which **BOND** directed **THOMAS** to meet him at an agreed-upon location.

20. On or about September 28, 2000, **GERALD THOMAS** had telephone conversations with **JOSEPH NEWMAN**, in which they arranged in coded and cryptic language for **THOMAS** to provide **NEWMAN** with one half-kilogram of cocaine.

21. On or about October 2, 2000, **GERALD THOMAS** had telephone conversations with **RICHARD BOND**, in which they arranged in coded and cryptic language for **THOMAS** to provide **BOND** with cocaine base ("crack") and in which they further discussed the process of cooking cocaine into crack.

22. On or about October 7, 2000, **GERALD THOMAS** had telephone conversations with **RICHARD BOND**, in which they arranged in coded and cryptic language for **THOMAS** to provide **BOND** with three ounces of crack.

23. On or about October 7, 2000, **GERALD THOMAS** had a telephone conversation with **KABONI SAVAGE**, in which **THOMAS** instructed **SAVAGE** in coded and cryptic language to obtain six kilograms of cocaine from a supplier who had offered to supply **SAVAGE** with cocaine for \$27,500 per kilogram.

24. On or about October 8, 2000, **KABONI SAVAGE** had a telephone conversation with **GERALD THOMAS**, in which they discussed in coded and cryptic language **SAVAGE**'s distribution of two kilograms of cocaine to an unidentified person, and the availability of another five kilograms of cocaine.

25. On or about October 10, 2000, **DAWUD BEY** had a telephone conversation with **GERALD THOMAS** and, speaking in coded and cryptic language, attempted to obtain nine ounces of cocaine.

26. On or about October 18, 2000, **KABONI SAVAGE**, **GERALD THOMAS**, and **PAUL DANIELS** had telephone conversations in which they negotiated and arranged in coded and cryptic language for **SAVAGE** and **THOMAS** to provide **DANIELS** with at least one-half kilogram of cocaine.

27. On or about October 18, 2000, **DAWUD BEY** had a telephone conversation with **GERALD THOMAS**, in which they discussed in coded and cryptic language the price of a kilogram of cocaine.

28. On or about October 21, 2000, **GERALD THOMAS** had a telephone conversation with **PAUL DANIELS**, in which **THOMAS**, speaking in coded and cryptic language, informed **DANIELS** that **KABONI SAVAGE** wanted **DAREN BLACKWELL** and **TYRONE BEAL** to manufacture and re-compress cocaine.

29. On or about October 23, 2000, **JAMES WALKER** had a telephone conversation with **GERALD THOMAS**, in which they arranged in coded and cryptic language for **WALKER** to provide **THOMAS** with \$3,500 as payment for a prior cocaine transaction.

30. On or about November 2, 2000, **GERALD THOMAS**, **KABONI SAVAGE**, Eugene Coleman, and Kareem Bluntly had telephone conversations in which they discussed in coded and cryptic language the need to replace equipment and materials used in the manufacture and re-compression of cocaine.

31. On or about November 4, 2000, **GERALD THOMAS** and **JOSEPH NEWMAN** had a telephone conversation in which **THOMAS** told **NEWMAN** he was looking to obtain a “chump,” meaning one kilogram of cocaine.

32. On or about November 7, 2000, **KABONI SAVAGE** had a telephone conversation with **GERALD THOMAS**, in which **SAVAGE** informed **THOMAS** in coded and cryptic language that **SAVAGE** had recently obtained five kilograms of cocaine, and he instructed **THOMAS** to contact K.C., a person known to the grand jury, to obtain the equipment needed to cut and re-compress the cocaine.

33. On or about November 9, 2000, **GERALD THOMAS** had telephone conversations with **JOSEPH NEWMAN**, in which they arranged in coded and cryptic language for **THOMAS** to provide **NEWMAN** with approximately one-half kilogram of cocaine.

34. On or about November 14, 2000, **GERALD THOMAS** had telephone conversations with **DAMMON EVERETT**, in which they arranged in coded and cryptic language for **THOMAS** to provide **EVERETT** with at least one kilogram of cocaine.

35. On or about November 14, 2000, **GERALD THOMAS** had telephone conversations with K.C., a person known to the grand jury, in which they arranged in coded and cryptic language for K.C. to supply **THOMAS** and **KABONI SAVAGE** with properly measured molds and plates needed to re-compress kilograms of cocaine.

36. On or about November 14, 2000, **GERALD THOMAS** had a telephone conversation with a person unknown to the grand jury, in which **THOMAS** offered in coded and cryptic language to sell a “brick,” meaning one kilogram of cocaine, for \$27,500.

37. On or about November 15, 2000, **JOSEPH NEWMAN** had a telephone conversation with **GERALD THOMAS**, in which they discussed in coded and cryptic language that **NEWMAN** had obtained and distributed three kilograms of cocaine to **NEWMAN**’s nephew and an unidentified person.

38. On or about November 16, 2000, **OSCAR FRANCIS** had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language to meet at 3643 North Darien Street (**KABONI SAVAGE**’s house) regarding a quantity of cocaine.

39. On or about November 17, 2000, **DAWUD BEY** had a telephone conversation with **GERALD THOMAS** and, using coded and cryptic language, inquired about the availability of cocaine. **BEY** informed **THOMAS** that **BEY** had a customer who was ready and willing to buy cocaine from **BEY**.

40. On or about November 18 and 19, 2000, **GERALD THOMAS** had telephone conversations with **OSCAR FRANCIS**, in which they arranged in coded and cryptic language for **THOMAS** to deliver to **FRANCIS** a quantity of cocaine at 3643 North Darien Street (**KABONI SAVAGE**’s house).

41. On or about November 23, 2000, Juan Rosado delivered approximately ten kilograms of cocaine to **KABONI SAVAGE**.

42. On or about November 27, 2000, **GERALD THOMAS** had telephone conversations with **RONALD JONES**, in which they arranged in coded and cryptic language for **THOMAS** to provide **RONALD JONES** with more than 4 ½ ounces of cocaine.

43. On or about November 27, 2000, **GERALD THOMAS** met **GREGORY MILLS** in the 3600 block of North Darien Street, after **THOMAS** and **MILLS** had telephone

conversations in which they arranged in coded and cryptic language for **THOMAS** to provide **MILLS** with approximately nine ounces of cocaine.

44. On or about November 29, 2000, **DAWUD BEY** had a telephone conversation with **GERALD THOMAS** and, using coded and cryptic language, complained about the quality of cocaine **BEY** had obtained from **KABONI SAVAGE**.

45. On or about December 1, 2000, **KABONI SAVAGE** had a telephone conversation with **GERALD THOMAS** and informed **THOMAS**, using coded and cryptic language, that **SAVAGE** arranged with a supplier to obtain five kilograms of cocaine; **THOMAS** indicated that he was going to begin re-compressing two kilograms of cocaine presently in his possession.

46. On or about December 1, 2000, **DEREK RUSSELL** had telephone conversations with **GERALD THOMAS** and arranged in coded and cryptic language to obtain seven ounces of cocaine from **THOMAS**, which **THOMAS** stated was concealed under a bathroom sink at **THOMAS**'s store (616 North 11<sup>th</sup> Street, Philadelphia, Pennsylvania).

47. On or about December 5, 2000, **GERALD THOMAS** had telephone conversations with **KABONI SAVAGE** and **PAUL DANIELS**, in which they arranged in coded and cryptic language for **DANIELS** to pay **SAVAGE** approximately \$30,000.

48. On or about December 7, 2000, **GREGORY MILLS** had telephone conversations with **GERALD THOMAS** and arranged in coded and cryptic language to obtain nine ounces of cocaine from **THOMAS**.

49. On or about December 8, 2000, **GERALD THOMAS** had a telephone conversation with Wendell Mason, in which they discussed in coded and cryptic language the costs associated with the sale and purchase of kilograms of cocaine.

50. On or about December 8, 2000, **GREGORY MILLS** had telephone conversations with **GERALD THOMAS** and informed him in coded and cryptic language that

**MILLS** had a customer looking to buy 125 grams of cocaine. **THOMAS** and **MILLS** further discussed the mechanics of cooking cocaine into crack.

51. On or about December 12, 2000, **KABONI SAVAGE** had telephone conversations with **GERALD THOMAS**, in which **SAVAGE** informed **THOMAS** in coded and cryptic language that **SAVAGE** had recently obtained ten kilograms of cocaine, but that most of the kilograms had been distributed to customers who had been waiting to receive cocaine. **SAVAGE** agreed to supply **THOMAS** with one kilogram of cocaine, and **SAVAGE**, using coded and cryptic language, told **THOMAS** to instruct **DAREN BLACKWELL** to come to **SAVAGE**'s house to re-compress the cocaine.

52. On or about December 12, 2000, **GERALD THOMAS** had telephone conversations with **MALIK JONES** and **RONALD JONES**, in which they arranged in coded and cryptic language for **THOMAS** to provide **MALIK JONES** and **RONALD JONES** with nine ounces of cocaine for \$7,500.

53. On or about December 15, 2000, **GERALD THOMAS** had telephone conversations with K.C., a person known to the grand jury, and arranged for K.C. to deliver materials and presses to be used in the manufacture and re-compression of cocaine.

54. On or about December 16, 2000, **GERALD THOMAS** had telephone conversations with **RONALD JONES** and **MALIK JONES**, in which they arranged in coded and cryptic language for **THOMAS** to provide them with at least 13 ½ ounces of cocaine, a portion of which **THOMAS** stated that he would cook into crack cocaine. In a subsequent telephone conversation, **RONALD JONES** stated in coded and cryptic language that he converted (cooked) a portion of the cocaine into crack.

55. On or about December 19, 2000, **DAMMON EVERETT** had a telephone conversation with **GERALD THOMAS**, in which **EVERETT** stated in coded and cryptic language his interest in obtaining cocaine. **THOMAS** then contacted **KABONI SAVAGE** and



arranged in coded and cryptic language to obtain one kilogram of good quality cocaine for **EVERETT**.

56. On or about December 21, 2000, K.C., a person known to the grand jury, had telephone conversations with **GERALD THOMAS** and arranged to deliver three properly measured press molds and plates to be used in the manufacture and re-compression of cocaine that were ordered by **KABONI SAVAGE**.

57. From on or about December 22, 2000, through on or about December 24, 2000, **RONALD JONES**, **MALIK JONES**, and **GERALD THOMAS** had telephone conversations in which they arranged in coded and cryptic language for **RONALD JONES** and **MALIK JONES** to return to **THOMAS** cocaine that **RONALD JONES** and **MALIK JONES** complained did not convert (cook) properly into crack. **THOMAS** promised to replace the product with cocaine powder. **RONALD JONES** and **MALIK JONES** subsequently arranged with **THOMAS** to retrieve the crack they had previously returned.

58. On or about December 25, 2000, Juan Rosado distributed at least five kilograms of cocaine to **KABONI SAVAGE**.

59. On or about January 6, 2001, **GERALD THOMAS** had a telephone conversation with **DAREN BLACKWELL** and asked in coded and cryptic language how many bottles of procaine (a cutting agent used in the re-compression of cocaine) were available at 396 East Upsal Street. After this conversation, **THOMAS** went to 396 East Upsal Street.

60. On or about January 7, 2001, **KABONI SAVAGE**, using a firearm, restrained, assaulted, and threatened to kill a person known to the grand jury, and forcibly took from that person money which **SAVAGE** believed had been stolen from his drug proceeds.

61. From on or about January 9, 2001, through on or about January 13, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they arranged in coded and cryptic language for Mason to provide **THOMAS** with two kilograms of cocaine.

62. On or about January 17, 2001, **DEREK RUSSELL** had telephone conversations with **GERALD THOMAS** and informed him in coded and cryptic language that **RUSSELL** had a potential customer who wanted to know the price for both a half-kilogram and a whole kilogram of cocaine. **THOMAS** replied that a half-kilogram would cost \$14,500, and that one kilogram would cost \$29,000.

63. On or about January 18, 2001, Juan Rosado supplied **KABONI SAVAGE** with approximately nine kilograms of cocaine.

64. On or about January 19, 2001, K.C., a person known to the grand jury, met **KABONI SAVAGE** and **GERALD THOMAS** at Mazer Real Estate Company, 8229 Stenton Road, Philadelphia, Pennsylvania, and provided **SAVAGE** and **THOMAS** with cocaine re-compression devices.

65. On or about January 19, 2001, **DAREN BLACKWELL** had a telephone conversation with **GERALD THOMAS** and, using coded and cryptic language, inquired about obtaining cocaine.

66. On or about January 19, 2001, **GERALD THOMAS** and **KABONI SAVAGE** distributed approximately two kilograms of cocaine to **MYRON WILSON**.

67. On or about January 19, 2001, **JAMES WALKER** had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language for an individual known to the grand jury to meet **THOMAS** near the 3600 block of North Darien Street, and to obtain from **THOMAS** approximately 4 ½ ounces of cocaine.

68. On or about January 20, 2001, **GERALD THOMAS** had telephone conversations with **JOSEPH NEWMAN**, in which **THOMAS** instructed **NEWMAN** in coded and cryptic language for **NEWMAN** to leave money with **KABONI SAVAGE** as payment for cocaine that **THOMAS** had provided to **NEWMAN** at an earlier time.

69. On or about January 24, 2001, **DAMMON EVERETT** had a telephone conversation with **GERALD THOMAS** and arranged in coded and cryptic language for **EVERETT** to obtain cocaine from **THOMAS** at the price they had previously discussed.

70. From on or about January 25, 2001, through on or about January 27, 2001, K.C., a person known to the grand jury, had telephone conversations with **GERALD THOMAS**, in which K.C. arranged in coded and cryptic language to deliver four re-compression devices to **KABONI SAVAGE**'s house, located at 3643 North Darien Street.

71. On or about January 30, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they arranged in coded and cryptic language for Mason to provide **THOMAS** with two to eight kilograms of cocaine. **THOMAS** and Mason subsequently met at 6528 Limekiln Pike, Philadelphia, Pennsylvania.

72. On or about January 31, 2001, **JOSEPH NEWMAN** had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language for **NEWMAN** to provide **THOMAS** and **KABONI SAVAGE** with at least three kilograms of cocaine, and in which **THOMAS** attempted to obtain several more kilograms of cocaine from **NEWMAN**.

73. On or about February 3, 2001, **JOSEPH NEWMAN** had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language for **NEWMAN** to provide **THOMAS** with five kilograms of cocaine, and in which they discussed **THOMAS**'s interest in obtaining an additional eight kilograms of cocaine from **NEWMAN** the next day.

74. On or about February 14 and 15, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they arranged in coded and cryptic language to meet at 57 Bonnie Gelman Drive, Philadelphia, Pennsylvania (Mason's residence), where Mason was to provide **THOMAS** with seven kilograms of cocaine.

75. On or about February 15, 2001, **GERALD THOMAS** met Wendell Mason at 57 Bonnie Gelman Drive.

76. On or about February 13 and 14, 2001, **DEREK RUSSELL** had telephone conversations with **GERALD THOMAS** and offered in coded and cryptic language to sell two firearms to **THOMAS**.

77. On or about February 13 and 14, 2001, **GERALD THOMAS** had telephone conversations with **DEREK RUSSELL** and **DEMETRIUS WILLIAMS**, in which they arranged in coded and cryptic language for **THOMAS** to provide **RUSSELL**, **WILLIAMS**, and an unidentified person with eleven ounces of cocaine.

78. On or about February 17, 2001, **GERALD THOMAS** had a telephone conversation with **KABONI SAVAGE**, in which they arranged in coded and cryptic language for **ROBERT WILKS** to retrieve at least one-half kilogram of cocaine from **SAVAGE**.

79. From on or about February 21, 2001, through on or about February 22, 2001, **GERALD THOMAS** had telephone conversations with **DEREK RUSSELL** and **MALIK JONES** and attempted to resolve a dispute over control of certain drug territory between **RUSSELL** and **JONES**.

80. On or about February 27, 2001, **GERALD THOMAS** had telephone conversations with **DEMETRIUS WILLIAMS** in which they arranged in coded and cryptic language for **THOMAS** to supply **WILLIAMS** with cocaine.

81. On or about March 1, 2001, **GERALD THOMAS** had telephone conversations with **DEMETRIUS WILLIAMS** in which they arranged in coded and cryptic language for **THOMAS** to supply **WILLIAMS** with seven ounces of cocaine.

82. From on or about March 16, 2001, through on or about March 20, 2001, **KABONI SAVAGE** had telephone conversations with a person known to the grand jury, in which they discussed in coded and cryptic language whether that person could provide **SAVAGE** with cocaine.

83. On or about March 17, 2001, **KABONI SAVAGE** had a telephone conversation with **MYRON WILSON**, in which they arranged in coded and cryptic language to meet in furtherance of a drug transaction.

84. On or about June 13, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they attempted to arrange in coded and cryptic language for Mason to supply to **THOMAS** five kilograms of cocaine.

85. On or about June 14, 2001, Wendell Mason possessed five kilograms of cocaine.

86. On or about June 14, 2001, **GERALD THOMAS** had a telephone conversation with Wendell Mason and, using coded and cryptic language, attempted to complete the purchase of five kilograms of cocaine.

87. In or about April 2002, **KABONI SAVAGE** and Kareem Bluntly obtained five kilograms of cocaine in South Philadelphia from a person known to the grand jury.

88. In or about April 2002, **KABONI SAVAGE** and Kareem Bluntly obtained another five kilograms of cocaine at a gas station in North Philadelphia from a person known to the grand jury.

89. On or about May 23, 2002, **ROBERT WILKS** possessed approximately 348 grams of cocaine and 142 grams of crack, a firearm, false identification, latex gloves, a heat sealer, drug packaging materials, and other items used in the processing, packaging, and distribution of cocaine and crack.

90. On or about January 30, 2003, **KABONI SAVAGE, STEVEN NORTHINGTON**, and other persons unknown to the grand jury, arrived at 3510 Palmetto Street, Philadelphia, Pennsylvania, to re-compress cocaine.

91. On or about February 27, 2003, **STEVEN NORTHINGTON** possessed approximately 90 packets of crack, various items used in the processing and packaging of powder cocaine and crack, two firearms, and assorted ammunition.

92. On or about March 11, 2003, at the request of **GERALD THOMAS**, Eugene Coleman re-compressed one kilogram of cocaine, which Coleman then delivered to **THOMAS** outside of 3510 Palmetto Street.

93. On or about April 7, 2003, **KABONI SAVAGE, OSCAR FRANCIS**, Eugene Coleman, and other persons known and unknown to the grand jury, possessed items used in the manufacture, processing, and re-compression of cocaine, including re-compression devices, numerous bottles and empty bottles of procaine and other cutting agents, and other drug-related items, at 3510 Palmetto Street.

94. On or about April 7, 2003, **KABONI SAVAGE** possessed a mini-blender with cocaine residue and procaine, which are used in the manufacture, processing, and re-compression of cocaine, at 3643 North Darien Street.

95. On or about April 7, 2003, **KABONI SAVAGE** and **STEVEN NORTHINGTON** possessed firearms at 3643 North Darien Street.

All in violation of Title 21, United States Code, Section 846.

## **COUNT TWO**

### **(Money Laundering Conspiracy)**

#### **THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs two through twelve and Overt Acts one through ninety-five of Count One are incorporated here.

2. From in or about September 1999 through in or about July 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**MELVIN STEIN,  
GERALD THOMAS,  
a/k/a "Baha Jabbaar,"  
a/k/a "Bubbie,"  
PAUL DANIELS,  
a/k/a "Paul Robinson,"  
a/k/a "P,"  
and  
ROBERT WILKS,  
a/k/a "Miami,"  
a/k/a "Robert Williams,"**

and others known and unknown to the grand jury, including Craig Oliver, who is charged elsewhere, knowingly conspired and agreed to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, knowing that the property involved in those financial transactions represented the proceeds of some form of unlawful activity, and which property in fact involved the proceeds of specified unlawful activity, that is, narcotics trafficking, punishable under the laws of the United States, with the intent to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

#### **MANNER AND MEANS**

It was part of the conspiracy that:

1. **GERALD THOMAS** frequently contacted **MELVIN STEIN**, a licensed real estate agent, on behalf of **THOMAS** and other persons associated with the Thomas-Savage

Organization, including **PAUL DANIELS, ROBERT WILKS**, and Craig Oliver, to enlist **STEIN**'s aid in laundering the proceeds of narcotics trafficking.

2. **MELVIN STEIN**, as a licensed real estate agent, knowingly accepted drug proceeds from **GERALD THOMAS, PAUL DANIELS, ROBERT WILKS**, Craig Oliver, and other persons known and unknown to the grand jury, in exchange for the lease and sale of real properties in Philadelphia, and for the sale of certain vehicles.

3. **MELVIN STEIN** assisted **GERALD THOMAS, PAUL DANIELS, ROBERT WILKS**, Craig Oliver, and other persons known and unknown to the grand jury, in purchasing or leasing real properties in Philadelphia in the names of aliases, third parties, or with no documentation, contrary to the standard practices of the real estate firm in which **STEIN** conducted business.

4. **MELVIN STEIN** sold motor vehicles to **ROBERT WILKS** and Craig Oliver, and **STEIN** assisted **WILKS** and Oliver in transferring title of the vehicles into the names of third parties.

5. **MELVIN STEIN** discussed by telephone and in person with **GERALD THOMAS, PAUL DANIELS, ROBERT WILKS**, Craig Oliver, and other persons known and unknown to the grand jury, ways and means to conceal assets and income derived from narcotics trafficking.

6. At **MELVIN STEIN**'s instructions, **GERALD THOMAS, PAUL DANIELS, ROBERT WILKS**, Craig Oliver, and **MELVIN STEIN** conducted face-to-face meetings at locations other than **STEIN**'s place of business, so as not to draw attention to their unlawful purposes. At these meetings, **THOMAS, DANIELS, WILKS**, and Oliver transferred lump sum amounts of cash, often thousands of dollars at a time, and which constituted the proceeds of narcotics trafficking, to **STEIN** as payment for real estate properties and cars, none of which were leased or titled in the names of **DANIELS, WILKS**, or Oliver.



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**Money Laundering Transaction #1**  
**(1546 East Upsal Street)**

7. From at least in or about September 1999 through in or about July 2003, **ROBERT WILKS** rented the premises located at 1546 East Upsal Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by **WILKS** to pay the rent, **STEIN** leased the property to **WILKS** in the names of S.W. and A.D., persons known to the grand jury. During this period, **WILKS** paid **STEIN** a total of at least \$32,705 cash proceeds from illegal drug trafficking as rental payments for that property.

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**Money Laundering Transaction #2**  
**(1805 East Tulpehocken Street)**

8. From at least in or about September 1999 through in or about July 2003, **PAUL DANIELS** resided at and owned the premises located at 1805 East Tulpehocken Street, Philadelphia, Pennsylvania. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by **DANIELS** to pay the mortgage on the property, **STEIN** held the mortgage in the name of G.S., a person known to the grand jury. During this period, **DANIELS** paid **STEIN** a total of at least \$41,000 cash proceeds from illegal drug trafficking as mortgage payments for that property.

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**Money Laundering Transaction #3**  
**(1995 BMW)**

9. In or about December 2000, **ROBERT WILKS** purchased a 1995 BMW for at least \$20,000 from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by **WILKS** to purchase the vehicle, **WILKS** and **STEIN** caused the vehicle to be titled in the name of R.D., a person known to the grand jury and who acted as the straw purchaser.

**Money Laundering Transaction #4**  
**(8563 Williams Avenue)**

10. From in or about March 2000 through in or about August 2002, Craig Oliver rented the premises located at 8563 Williams Avenue, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** prepared the lease and all paperwork in the name of K.O., a person known to the grand jury. Oliver paid **STEIN** a total of approximately \$28,830 in cash proceeds from illegal drug trafficking as rental payments for that property.

**Money Laundering Transaction #5**  
**(7507 Woolston Street)**

11. From in or about March 2002 through in or about July 2003, Craig Oliver rented the premises located at 7507 Woolston Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** prepared the lease and all paperwork in the name of E.B., a person known to the grand jury. Oliver paid **STEIN** a total of approximately \$15,895 in cash drug proceeds as rental payments for that property.

**Money Laundering Transaction #6**  
**(450 Vernon Road)**

12. From in or about March 2002 through in or about December 2003, Craig Oliver rented the premises located at 450 Vernon Road, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** leased the property without a written lease agreement or other paperwork, and all payments were made in cash. Oliver paid **STEIN** a total of approximately \$19,800 in cash drug proceeds as rental payments for that property.

**Money Laundering Transaction #7**  
**(728 Phil Ellena Street)**

13. From in or about June 2002 through in or about July 2003, Craig Oliver rented the premises located at 728 Phil Ellena Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** prepared the lease and all paperwork in the false name "James Blair." Oliver paid **STEIN** a total of approximately \$25,425 in cash drug proceeds as rental payments for that property.

**Money Laundering Transaction #8**  
**(7963 Fayette Street)**

14. From in or about March 2003 through in or about December 2003, Craig Oliver rented the premises located at 7963 Fayette Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** leased the property without a written lease agreement or other paperwork, and all payments were made in cash. Oliver paid **STEIN** a total of approximately \$8,500 in cash drug proceeds as rental payments for that property.

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**Money Laundering Transaction #9**  
**(1999 Toyota Solara)**

15. In or about September 2002, using proceeds from illegal drug trafficking, Craig Oliver purchased a 1999 Toyota Solara for approximately \$17,000 from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to purchase the vehicle, Oliver and **STEIN** caused the car to be titled in the name of K.O., a person known to the grand jury and who acted as the straw purchaser.

All in violation of Title 18, United States Code, Section 1956(h).

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**COUNTS THREE THROUGH SEVEN**

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**(Money Laundering)**

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**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs two through twelve and Overt Acts one through ninety-five of Count One of this Indictment are incorporated here.

2. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

**KABONI SAVAGE,  
a/k/a "Yusef Billa,"  
a/k/a "Joseph Amill,"  
a/k/a "Bonnie," "Bon," "B,"**

knowingly conducted and attempted to conduct the following financial transactions affecting interstate and foreign commerce:

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>FINANCIAL TRANSACTION</u></b>
<b>3</b>	January 26, 2001	<b>KABONI SAVAGE</b> purchased a 1998 Ford from Chapman Ford, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the car was approximately \$20,135.
<b>4</b>	September 12, 2001	<b>KABONI SAVAGE</b> purchased a 2001 Jeep from Triboro Motors, Cinnaminson, New Jersey, in the false name "Yusef Billa." The purchase price of the car was approximately \$38,895.
<b>5</b>	January 29, 2002	<b>KABONI SAVAGE</b> purchased a house located at 1732 Kendrick Street, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the house was approximately \$127,500.
<b>6</b>	March 30, 2002	<b>KABONI SAVAGE</b> purchased a 2002 Subaru from Wilkie Subaru, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the car was approximately \$29,094.
<b>7</b>	June 24, 2002	<b>KABONI SAVAGE</b> purchased a house located at 6641 Lynford Street, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the house was approximately \$65,900.

3. When conducting and attempting to conduct each of the financial transactions described in paragraph two above, **KABONI SAVAGE** knew that the money involved in each financial transaction constituted the proceeds of some form of unlawful activity.

4. Each financial transaction described in paragraph two involved the proceeds of a specified unlawful activity, that is, conspiracy to manufacture and distribute cocaine and cocaine base, as charged in Count One of this Indictment, and **KABONI SAVAGE** acted knowing that each transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT EIGHT

(Money Laundering)

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs two through twelve and Overt Acts one through ninety-five of Count One of this Indictment are incorporated here.

2. On or about February 4, 2000, in the Eastern District of Pennsylvania, defendant

**ROBERT WILKS,  
a/k/a “Miami,”  
a/k/a “Robert Williams,”**

knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, that is, **ROBERT WILKS** purchased a 1997 Acura from Winner Lincoln Mercury, Philadelphia, Pennsylvania, in the false name “Robert Williams.” The purchase price of the car was approximately \$18,995.

3. When conducting and attempting to conduct the financial transaction described in paragraph two above, **ROBERT WILKS** knew that the money involved in the financial transaction constituted the proceeds of some form of unlawful activity.

4. The financial transaction described in paragraph two involved the proceeds of a specified unlawful activity, that is, conspiracy to manufacture and distribute cocaine and cocaine base, as charged in Count One of this Indictment, and **ROBERT WILKS** acted knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT NINE

(Money Laundering)

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs two through twelve and Overt Acts one through ninety-five of Count One of this Indictment are incorporated here.

2. On or about May 8, 2001, in the Eastern District of Pennsylvania, defendant

**PAUL DANIELS,  
a/k/a "Paul Robinson,  
a/k/a "P,"**

knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, that is, **PAUL DANIELS** purchased a 1997 Chevrolet from James Chevrolet, West Chester, Pennsylvania, in the false name "Paul Robinson." The purchase price of the car was approximately \$20,430.

3. When conducting and attempting to conduct the financial transaction described in paragraph two above, **PAUL DANIELS** knew that the money involved in the financial transaction constituted the proceeds of some form of unlawful activity.

4. The financial transaction described in paragraph two involved the proceeds of a specified unlawful activity, that is, conspiracy to manufacture and distribute cocaine and cocaine base, as charged in Count One of this Indictment, and **PAUL DANIELS** acted knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

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**COUNT TEN**

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**(Money Laundering)**

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**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs two through twelve and Overt Acts one through ninety-five of Count One of this Indictment are incorporated here.

2. On or about December 29, 2003, in the Eastern District of Pennsylvania, defendant

**STEVEN NORTINGTON,  
a/k/a "Smoke,"  
a/k/a "Michael Tillery,"  
a/k/a "Syed Burhannon,"  
a/k/a "Kevin Lewis,"**

knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, that is, **STEVEN NORTINGTON** purchased a 1999 Pontiac Grand Prix from Carl H. & Ruth Auto Sales, Plymouth Meeting, Pennsylvania, in the false name "Syed Burhannon." The purchase price of the car was approximately \$5,000.

3. When conducting and attempting to conduct the financial transaction described in paragraph two above, **STEVEN NORTINGTON** knew that the money involved in the financial transaction constituted the proceeds of some form of unlawful activity.

4. The financial transaction described in paragraph two involved the proceeds of a specified unlawful activity, that is, distribution of cocaine and cocaine base, punishable under the laws of the United States, and **STEVEN NORTINGTON** acted knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).



**COUNT ELEVEN**

**(Possession of a Firearm in Furtherance of a Drug Trafficking Offense)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 7, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**KABONI SAVAGE,  
a/k/a “Yusef Billa,”  
a/k/a “Joseph Amill,”  
a/k/a “Bonnie,”  
a/k/a “Bon,”  
a/k/a “B,”**

knowingly possessed a firearm, that is, a semi-automatic handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to manufacture and distribute more than five kilograms of cocaine and more than 50 grams of cocaine base, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT TWELVE**

**(Convicted Felon in Possession of a Firearm)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 27, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**STEVEN NORTINGTON,  
a/k/a "Smoke,"  
a/k/a "Michael Tillery,"  
a/k/a "Syeed Burhannon,"  
a/k/a "Kevin Lewis,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce certain firearms, that is, an Intertec AB-10 9mm automatic handgun with an obliterated serial number, and a Davis Industries P-380 handgun (serial number AP503610).

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THIRTEEN**

**(Convicted Felon in Possession of a Firearm)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 7, 2003, at Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**KABONI SAVAGE,  
a/k/a “Yusef Billa,”  
a/k/a “Joseph Amill,”  
a/k/a “Bonnie,”  
a/k/a “Bon,”  
a/k/a “B,”**

**and**

**STEVEN NORTHINGTON,  
a/k/a “Smoke,”  
a/k/a “Michael Tillery,”  
a/k/a “Syeed Burhannon,”  
a/k/a “Kevin Lewis,”**

each having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce certain firearms, that is, a Sig Sauer P225 9mm semi-automatic handgun (serial number M586419), and a Ruger Redhawk .44 caliber semi-automatic handgun (serial number 502-15971).

In violation of Title 18, United States Code, Section 922(g)(1).

## **NOTICE OF FORFEITURE**

As a result of the violations of Title 21, United States Code, Section 846, as set forth in Count One of this Indictment, and of Title 18, United States Code, Sections 1956(h) and 1956(a)(1), as set forth in Counts Two through Ten of this Indictment, defendants

**GERALD THOMAS,  
a/k/a "Baha Jabbaar,"  
a/k/a "Bubbie,"  
KABONI SAVAGE,  
a/k/a "Yusef Billa,"  
a/k/a "Joseph Amill,"  
a/k/a "Bonnie," "Bon," "B,"  
PAUL DANIELS,  
a/k/a "Paul Robinson,"  
a/k/a "P,"  
ROBERT WILKS,  
a/k/a "Miami,"  
a/k/a "Robert Williams,"  
DAWUD BEY,  
STEVEN NORTHINGTON,  
a/k/a "Smoke,"  
a/k/a "Michael Tillery,"  
a/k/a "Syeed Burhannon,"  
a/k/a "Kevin Lewis,"  
OSCAR FRANCIS,  
MYRON WILSON,  
MELVIN STEIN,  
JOSEPH NEWMAN,  
a/k/a "Gerald King,  
a/k/a "Yusef,"  
DAMMON EVERETT,  
JAMES WALKER,  
a/k/a "Candy,"  
GREGORY MILLS,  
a/k/a "Philly Frank,"  
DAREN BLACKWELL,  
a/k/a "Double,"  
TYRONE BEAL,  
a/k/a "Scoop,"  
DEREK RUSSELL,  
a/k/a "Fly,"  
DEMETRIUS WILLIAMS,  
a/k/a "Meat,"  
MALIK JONES,  
RONALD JONES,  
a/k/a "Sneaker Store,"  
and  
RICHARD BOND,**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982: (a) all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violations; (b) any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations; and (c) property involved in money laundering violations, or any property traceable to such property, including but not limited to the following:

1. \$5,000,000 in proceeds;
2. 9 Blue Grass Road, Clementon, New Jersey;
3. 450 East Vernon Road, Philadelphia, Pennsylvania;
4. 616 North 11<sup>th</sup> Street, Philadelphia, Pennsylvania;
5. 728 East Phil Ellena Street, Philadelphia, Pennsylvania;
6. 1546 East Upsal Street, Philadelphia, Pennsylvania;
7. 1732 Kendrick Street, Philadelphia, Pennsylvania;
8. 1805 East Tulpehocken Street, Philadelphia, Pennsylvania;
9. 2000 West Cheltenham Avenue, Philadelphia, Pennsylvania;
10. 6641 Lynford Street, Philadelphia, Pennsylvania;
11. 7507 Woolston Avenue, Philadelphia, Pennsylvania;
12. 7963 Fayette Street, Philadelphia, Pennsylvania;
13. 8563 Williams Avenue, Philadelphia, Pennsylvania;
14. 1995 BMW purchased on December 9, 2000, from Sloane Nissan of Ardmore, Ardmore, Pennsylvania, for \$21,543 and titled in the name of R.D., a person known to the grand jury;
15. 1997 Acura Coupe purchased on February 1, 2000, from Winner Lincoln Mercury of Philadelphia, Pennsylvania, for \$18,995, and titled in the false name "Robert Williams";

16. 1997 Chevrolet Tahoe purchased on May 8, 2001, from James Chevrolet, Inc., of West Chester, Pennsylvania, for \$26,212 and titled in the false name "Paul Robinson," later repossessed by Beneficial Savings Bank on November 13, 2003, and re-sold to 22<sup>nd</sup> Street Motors, Inc., of Philadelphia, Pennsylvania;
17. 1997 Dodge Sedan given as a gift on October 8, 2002, with title transferred from the false name "Baha Jabbaar" to C.S., a person known to the grand jury;
18. 1997 Mercury purchased on July 29, 1999, from Hopkins Ford, Inc., of Jenkintown, Pennsylvania, for \$19,495 and titled in the false name "Joseph Amill";
19. 1998 Ford Truck purchased on January 26, 2001, from Chapman Ford Sales, Inc., of Philadelphia, Pennsylvania, for \$20,135 and titled in the false name "Yusef M. Billa";
20. 2001 Chrysler Jeep purchased on September 12, 2001, from Triboro Motors, Inc., of Cinnaminson, New Jersey, for \$20,895 and titled in the false name "Yusef M. Billa";
21. 2002 Subaru purchased on March 30, 2002, from Wilkie Subaru of Philadelphia, Pennsylvania, for \$29,094 and titled in the false name "Yusef M. Billa";
22. 1999 Pontiac Grand Prix purchased on December 29, 2003, from Carl H. & Ruth Auto Sales, Plymouth Meeting, Pennsylvania, for \$5,000 and titled in the false name "Syeed Burhannon";
23. Intertec AB-10 9mm automatic handgun with an obliterated serial number;
24. Davis Industries P-380 handgun (serial number AP503610);
25. Sig Sauer P225 9mm semi-automatic handgun (serial number M586419);
26. Ruger Redhawk .44 caliber semi-automatic handgun (serial number 502-15971);

### **SUBSTITUTE ASSETS**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants,

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**  
**Eastern District of Pennsylvania**